

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

v.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through
10, inclusive,

Defendants.

CASE NO.: 2-23-cv-6302

EXPERT REPORT OF CHARLES L. BAUM, PH.D.

August 16, 2024

ECONOMIC LOSS APPRAISAL IN THE CASE OF MARK SNOOKAL

1. I am Charles L. Baum II, Ph.D., a professor of economics and finance at Middle Tennessee State University. I have a Ph.D. in economics from the University of North Carolina at Chapel Hill and a B.A. in political science and a B.A. in economics from Wake Forest University. My full curriculum vita is provided as Exhibit A. Neither I nor my opinions represent Middle Tennessee State University, the University of North Carolina at Chapel Hill, or Wake Forest University in this matter. I generate this report on behalf of Baum Economics LLC.



2. I have been asked to provide an analysis of the lost earnings and lost employment benefits for Mark Snookal (Mr. Snookal) due to the rescission of a position in Nigeria by Chevron USA, Inc. (Chevron) in or around August 2019 and a subsequent employment termination from Chevron in or around September 2021.
3. In return for this report, I am compensated at a rate of \$275 per hour by the plaintiff.
4. I am not asked to provide, nor do I plan to provide, an expert opinion on liability, legal issues, or the law. I attempt to follow guidance provided by case law in my calculations.
5. It is my understanding Mr. Snookal was born [REDACTED] 1972, is a high school graduate, and lived in Los Angeles (Los Angeles County), California, with his wife, Constance (born [REDACTED]), and son, Benjamin (born [REDACTED] [REDACTED]).
6. It is my understanding Mr. Snookal was hired by Chevron on January 12, 2009 as an analyzer designs engineer in the technical services department at the El Segundo refinery (designing and engineering functions for the installation of analyzer systems) and was promoted in 2011 to maintenance supervisor in the analyzer and digital group (creating and implementing three-year plans for needed changes and to improve performance), in 2013 to analyzer reliability improvement champion in the technical services department (developing and implementing the analyzer reliability program for the entire El Segundo facility), and in 2016 to instrumentation, electrical, and analyzer reliability team lead in the reliability department (leading a team responsible for inspecting, testing, and maintaining instrumentation and electrical and analyzer assets).
7. It is my understanding Mr. Snookal in 2019 applied for the position of reliability engineer manager (REM) in Nigeria, which would have had a grade-22 salary with a promotion to a grade-23 salary after no more than 6 months, and Chevron offered Mr. Snookal this position, to begin August 1, 2019.
8. It is my understanding Mr. Snookal, as part of the process of being transferred to Nigeria, was required to undergo a medical screening, and after this screening, Chevron deemed Mr. Snookal unfit for duty (due at least partly to cardiology issues) and rescinded the job offer without attempting to make reasonable accommodations.
9. It is my understanding Mr. Snookal later applied for three additional job openings at Chevron (i.e., operating assistant, general team lead, and maintenance change

operating assistant) that would have constituted promotions, but these positions were offered to younger workers.

10. It is my understanding Mr. Snookal was demoted by Chevron (to reliability change operating assistant, a non-supervisory position), which resulted in depression, and he was essentially forced to resign (i.e., was constructively discharged) in September 2021.
11. It is my understanding Mr. Snookal believes his employment termination from Chevron constitutes a failure to accommodate a disability and is discriminatory, wrongful, and in violation of California statutes and public policy.
12. It is my understanding Mr. Snookal just prior to leaving Chevron diligently searched for replacement employment in good faith and found another job working for Nippon Dynawave Packaging Co. as a maintenance superintendent from September 2021 to September 2023 and for Georgia Pacific beginning September 2023, where he remains currently employed.
13. According to documents I have reviewed, Mr. Snookal had taxable income of \$179,475 in 2021, \$143,145 in 2022, and \$179,623 in 2023.
14. According to documents I have reviewed, Mr. Snookal earned from Chevron in 2018 base pay equal to \$136,100 plus \$22,800 in company, unit, and individual performance incentives (or bonuses) (for a total of \$158,900 in wage and salary income, with performance incentives equal to 16.75 percent of base pay) with employee medical insurance contributions of \$4,560, employee dental insurance contributions of \$180 and \$120, employee vision insurance contributions of \$337, employer pension contributions of \$20,629, and employer ESIP benefits of \$12,612.
15. According to documents I have reviewed, Mr. Snookal with an assignment to Nigeria would have received a base salary of \$141,100 per year with company, unit, and individual performance incentives (or bonuses), additional pay for unused vacation days, a location premium (a base-pay adjustment factor of 55 percent), tax equalization payments on the location premium, and a travel allowance (with employment benefits calculated on base salary, not including the location premium or travel allowance). Mr. Snookal would have received the pay increase to \$141,100 per year with company, unit, and individual performance incentives in 2019 with or without the assignment to Nigeria.
16. According to documents I have reviewed, Mr. Snookal had earnings from Chevron of \$161,243.36 in 2019 and \$155,628.57 in 2020 with health insurance

- benefits, pension benefits, and employer ESIP contributions equal to up to 8 percent of earnings.
17. According to documents I have reviewed, Mr. Snookal's pension benefits through Chevron would have equaled 11 percent of highest average-five earnings multiplied by years of service up to age 60 plus 14 percent of highest average-five earnings multiplied by years of service beyond age 60 as a lump sum with retirement between the ages of 60 and 65.
 18. According to documents I have reviewed, Mr. Snookal received a base salary of \$150,000 per year from Nippon Dynawave Packaging Company (in year-2021 dollars), with the ability to earn a bonus targeted to be 20 percent of earnings, health insurance benefits, and retirement benefits equal to 3 to 4 percent of earnings.
 19. It is my understanding Mr. Snookal receives a base salary of \$180,000 per year from Georgia Pacific (in year-2024 dollars), with the ability to earn a bonus targeted to be 2 to 3 percent of earnings, health insurance benefits, and retirement benefits equal to up to 8.5 to 10.5 percent of earnings.
 20. In this analysis, based on the assumption that paragraphs 5-19 are true, I calculate the economic losses to Mr. Snookal in the form of lost earnings and lost employment benefits due to the recission of a position in Nigeria by Chevron and an employment termination from Chevron.
 21. **The present value of the economic losses to Mr. Snookal is calculated to range from \$2,714,283 (from the employment termination and the position recission but no promotion to a grade-23 salary) to \$3,477,885 (from the employment termination and the recission of the position in Nigeria with the promotion to a grade-23 salary).**
 22. The case-related documents used to prepare this analysis are listed in Exhibit B and other references are listed in Exhibit C.
 23. Federal courts in Ninth Circuit employment cases allow recovery for lost earnings as part of the process of making the injured party whole (*Albemarle Paper Co. v. Moody*, 422 U.S. 405, 418, 95 S.Ct. 2362, 2372, 45 L.Ed.2d 280 (1975)). Lost pay from the time of the discrimination to the trial (back pay) and after the trial (front pay) are both recoverable (*Thorne v. City of El Segundo*, 802 F.2d 1131, 1136 (9th Cir.1986); *Cassino v. Reichhold Chemicals, Inc.*, 817 F.2d 1338, 1346 (9th Cir.1987); *Baum*, 2021).

24. Lost employment benefits, such as insurance and retirement benefits, are recoverable in Ninth Circuit employment cases (*Cassino v. Reichhold Chemicals, Inc.*, 817 F.2d 1338, 1348 (9th Cir.1987); *Kelly v. Am. Standard, Inc.*, 640 F.2d 974, 985 (9th Cir.1981)). The pecuniary value for employee benefits is typically measured by the actual cost to employers (*Galindo v. Stoody*, 793 F.2d 1502, 1517 (9th Cir.1986)). Health and life insurance in the Ninth Circuit are valued differently—as out-of-pocket replacement costs incurred by the terminated plaintiff, rather than the cost of the premiums to the terminating employer (*E.E.O.C. v. Farmer Bros. Co.*, 31 F.3d 891, 902 (9th Cir.1994)). If the terminated worker did not replace the lost health insurance, then the medical costs while uninsured that would have been paid by the defendant’s insurance plan may be awarded as damages as well.
25. The economic loss is the present value of the difference in Mr. Snookal’s projected earnings and employment benefits at Chevron absent Chevron’s recission of the position in Nigeria and his employment termination minus his actual and projected earnings and employment benefits from Chevron and replacement employment.
26. A projected trial date of February 4, 2025 date of is used to develop a calculation of the economic losses.
27. The first part of the calculation is the loss from the pre-trial period, which is August 1, 2019 (the date of Chevron’s recission of the position in Nigeria) through February 4, 2025. The second part is the loss from the post-trial period from February 5, 2025 through February 23, 2035, which is the period represented by Mr. Snookal’s remaining worklife expectancy (13.47 years) from the time of his employment termination (Skoog, Ciecka, and Krueger, 2019). Worklife expectancies are derived from Markov increment-decrement models, which are based on survival probabilities calculated using the U.S. Life Tables and employment transition probabilities calculated with Current Population Survey (CPS) data.
28. In a first scenario, shown in Table 1, I assume Mr. Snookal absent his employment termination is transferred to a position in Nigeria with a location premium of 55 percent by August 1, 2019 (but that he is not then promoted to a grade-23 salary position). I project Mr. Snookal absent his employment termination from Chevron would have continued earning \$161,243.36 per year (in year-2019 dollars), which equals Mr. Snookal’s earnings from Chevron in 2019, the last full calendar year before his employment termination. Mr. Snookal’s base pay of \$141,100 with company, unit, and individual performance incentives equal

to 16.75 percent of base pay is \$164,734 per year.

29. Mr. Snookal's future earnings are assumed to grow over time with price inflation and productivity (Becker, 1975; Ben-Porath, 1967; Gilbert, 1997). Wages tend to increase over time with prices to maintain purchasing power, and wages tend to increase over time as workers become more productive with the newest and latest technologies. Workers also become more productive over their careers as they acquire work experience and learn new skills on the job.
30. I project future wage inflation using a rate of 3.33 percent per year. Over the past 10 years, the average annual growth rate in weekly earnings for production and nonsupervisory employees in the private sector in the Current Employment Statistics (CES), in the wages and salaries of all civilian workers in the Employment Cost Index (ECI), and in wages for covered workers reported by the Social Security Administration (SSA) has been 3.63 percent, and over the past 20 years, the average rate of annual wage growth in CES, ECI, and SSA data has been 3.13 percent (Bureau of Labor Statistics, 2024a, 2024b). The Congressional Budget Office forecasts wage growth for civilian workers of 3.00 percent per year in 10 years, and the Social Security Advisory Board predicts long-term wage growth for covered workers of 3.56 percent annually (Congressional Budget Office, 2024; Social Security Trustees Report, 2024).
31. I include the value of lost employment benefits in the economic loss calculations.
32. I include the value of supplemental pay for 25 unused vacation days (multiplied by a factor of 1.4, as per Chevron policy) and the value of tax equalization benefits on the location premium (valued at 13.53 percent of the location premium or 7.44 percent of base pay, according to Chevron's remuneration report for Mr. Snookal).
33. I project Mr. Snookal absent his employment termination would have continued receiving employer ESIP contributions equal to 8 percent of earnings.
34. I project Mr. Snookal, absent his employment termination, would have continued receiving government-mandated employment benefits. Government-mandated employment benefits equal the employer-paid portion of the payroll tax (OASDI), which is 6.2 percent of earnings up to the Social Security wage base, which is \$137,700 for 2020, \$142,800 for 2021, \$147,000 for 2022, \$160,200 for 2023, and \$168,600 for 2024 for the Social Security's Old-Age, Survivors, and Disability Insurance program (Social Security Administration, 2024a). The 1.45 percent payroll tax for Medicare is not included in the economic losses. Future Social Security wages bases are assumed to increase at the rate of price inflation.

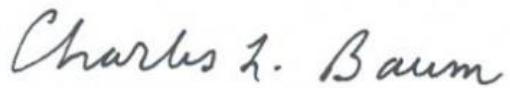
35. Future price inflation is projected to be 2.50 percent per year. Over the past 10 years, the average rate of annual price inflation, as measured by the Consumer Price Index, has been 2.74 percent, and over the past 20 years, it has been 2.57 percent per year (Bureau of Labor Statistics, 2024c). The Congressional Budget Office forecasts price inflation of 2.30 percent annually in 10 years, and the Social Security Advisory Board predicts long-term price inflation of 2.40 percent per year (Congressional Budget Office, 2024; Social Security Trustees Report, 2024).
36. I deduct from the economic losses Mr. Snookal's actual and projected earnings and the value of employment benefits from Chevron (without a transfer to a position in Nigeria) and replacement employment. This equals \$161,243.36 in 2019, \$155,628.57 in 2020, \$179,475 in 2021, \$143,145 in 2022, and \$179,623 in 2023, with Chevron ESIP benefits equal to 8 percent of earnings from Chevron, employer-matching retirement contributions equal to 4 percent of earnings from Nippon Dynawave Packaging Co., and employer-matching retirement contributions equal to 9.5 percent of earnings from Georgia Pacific and with employer Social Security contributions from all employers equal to 6.2 percent of earnings up to the Social Security wage base, described above. Thereafter, I project Mr. Snookal earns \$180,000 per year (in year-2023 dollars) from Georgia Pacific with a 3 percent bonus. As before, I project Mr. Snookal's earnings to increase at the rate of wage growth, described above.
37. Throughout the analysis, losses are adjusted for the annual probability Mr. Snookal would have remained employed by Chevron in each future year of the analysis (see estimation procedures in Baum, 2013). These annual probabilities are calculated using regression model parameters estimated with data collected by the Bureau of Labor Statistics through the National Longitudinal Survey of Youth. These estimates are adjusted for and are specific to Mr. Snookal's gender, age, education level, wage rate, occupation, and tenure with the defendants and are adjusted for economic conditions. Shown in the Tables is the yearly survival probability for the period from 2025 throughout the analysis with Chevron. The survival probability is derived from annual hazard rates. The hazard rate is the conditional probability Mr. Snookal's employment for the defendant would have ended in a particular year. The survivor rate is the cumulative of the hazard rates and is the probability Mr. Snookal would have remained employed for the defendant for a particular duration given his tenure.
38. I project Mr. Snookal absent his employment termination would have received a lump sum pension benefit from Chevron upon retirement at the end of his worklife expectancy equal to \$764,191, based on a high average-five earnings of

- \$263,002 and 25.74 years of service.
39. I deduct from the economic losses the lump-sum pension benefit from Chevron Mr. Snookal will receive with his employment termination at the end of his worklife expectancy, which equals \$210,227, based on a high average-five earnings of \$151,251 and 12.64 years of service.
 40. I assume Mr. Snookal receives comparable medical, dental, and vision insurance benefits from Chevron and replacement employment.
 41. Future economic losses should be discounted to present cash value in federal employment cases (*Jones & Laughlin Steel Corp. v. Pfeifer*, 462 U.S. 523, 533 (1983)). This is because an amount of money paid today if invested can grow over time with interest. The present value of a future loss is the amount today needed to equal that future sum with growth from investment interest. The U.S. Supreme Court has determined the rate of interest used for present-value discounting should be that on “the best and safest investments.” The Ninth Circuit does not specify a rate for present-value discounting, and several approaches may be used (*Gauthier v. Eastern Oregon Correctional Institution*, 2006 WL 2728957, at *4 (D.Ore.2006)).
 42. Future dollar values are discounted to present value using a rate of 3.41 percent. Over the past 10 years, the average interest rate on 1-year treasury bills, 10-year treasury notes, and 20-year treasury bonds has been 2.17 percent, and over the past 20 years, the average interest rate on 1-year treasury bills, 10-year treasury notes, and 20-year treasury bonds has been 2.66 percent (Board of Governors of the Federal Reserve System, 2024). The Congressional Budget Office forecasts interest rates on 10-year treasury notes to be 4.10 percent in 10 years, and the Social Security Advisory Board predicts long-term interest rates on a mix of treasury securities to be 4.70 percent (Congressional Budget Office, 2024; Social Security Trustees Report, 2024).
 43. Just as a lump sum paid today can grow when invested with interest to a larger amount in the future—which motivates present value discounting of future losses—past losses could have grown to a larger amount today if invested with interest. The economic theory of the time value of money suggests past losses should be increased due to the ability to earn interest (just as future losses should be reduced to present value due to the ability to earn interest, discussed below). Pre-judgment interest makes wronged plaintiffs whole by reimbursing for the lost use of funds.
 44. Courts in the Ninth Circuit have the discretion to include pre-judgment interest in

the economic losses (*Domingo v. New England Fish Co.*, 727 F.2d 1429, 1446 (9th Cir.1984)). The court in the Ninth Circuit also retains discretion over the rate to use for pre-judgment interest (*W. Pac. Fisheries, Inv. v. SS President Grant*, 730 F.2d 1280, 1288 (9th Cir.1984)). Although different interest rates have been used (including state statutory rates and the IRS rates in 26 U.S.C. § 6621), the federal post-judgement rate specified in 28 U.S.C. § 1961—the rate on 52-week treasury bills—is preferred for pre-judgment interest in the Ninth Circuit (*Blankenship v. Liberty Life Assur. Co. of Boston*, 486 F.3d 620, 628 (9th Cir.2007)).

45. Presented in Table 1, the present value of the economic losses from lost earnings and lost employment benefits for Mr. Snookal is calculated to be \$2,714,283.
46. In a second scenario, shown in Table 2, I assume Mr. Snookal absent his employment termination is transferred to a position in Nigeria with a location premium of 55 percent by August 1, 2019, and he is then promoted to a grade-23 salary position by January 1, 2020, with Mr. Snookal receiving 85 percent of a 16 percent increase in grade pay. Employment and pension benefits are adjusted accordingly. As before, in this scenario, I include the value of supplemental pay for 25 unused vacation days (multiplied by a factor of 1.4, as per Chevron policy) and the value of tax equalization benefits on the location premium (valued at 13.53 percent of the location premium or 7.44 percent of base pay, according to Chevron's remuneration report for Mr. Snookal). Otherwise, I use the same methodology and make the same assumptions as in my first scenario. In this second scenario, the present value of the economic losses from lost earnings and employment benefits for Mr. Snookal is calculated to be \$3,477,885.
47. Given the documents and information provided by Mr. Snookal and his attorneys and given the applicable economic information available for the analysis, I believe these calculations and this analysis to be reasonable and reflective of the economic circumstances of this case.

48. I reserve the right to revise this report if or when additional information becomes available.



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Table 1: Economic Losses from Lost Earnings and Lost Employment Benefits for Mr. Snookal

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Year	Wage Growth Rate	Chevron Earnings and Performance Pay	Chevron Supplemental Vacation Pay	Chevron Location Premium	Chevron Tax Equalization Benefit on Location Premium	Chevron ESIP Contribution	Chevron Employer Social Security Contribution	Actual Earnings, Performance Pay, and Bonuses	Actual Retirement Benefits (or ESIP Contributions)	Actual Employer Social Security Contribution	Loss	Tenure Prob.	Chevron Pension Benefits	Actual Chevron Pension Benefits	Adjusted Loss
Past															
2019	3.22	161,243	6,442	36,952	4,999	12,899	8,240	161,243	12,899	8,240	48,393	1.000	0	0	48,393
2020	3.82	155,629	14,923	85,596	11,579	12,450	8,537	155,629	12,450	8,537	112,099	1.000	0	0	112,099
2021	6.20	177,781	17,047	97,779	13,227	14,222	8,854	179,475	11,965	8,854	128,617	1.000	0	0	128,617
2022	5.47	187,509	17,980	103,130	13,951	15,001	9,114	143,145	5,726	8,875	188,940	1.000	0	0	188,940
2023	4.34	195,639	18,760	107,601	14,556	15,651	9,932	179,623	10,478	9,932	162,105	1.000	0	0	162,105
2024	3.33	202,153	19,385	111,184	15,040	16,172	10,453	185,400	17,613	10,453	160,922	1.000	0	0	160,922
2025	3.33	20,030	1,921	11,017	1,490	1,602	1,027	18,370	1,745	1,027	15,945	1.000	0	0	15,945
Future															
2025	3.33	188,855	18,109	103,870	14,051	15,108	9,687	173,204	16,454	9,687	150,336	0.973	0	0	146,261
2026	3.33	215,841	20,697	118,713	16,059	17,267	10,982	197,953	18,806	10,982	171,818	0.953	0	0	163,820
2027	3.33	223,029	21,386	122,666	16,593	17,842	11,257	204,545	19,432	11,257	177,539	0.932	0	0	165,393
2028	3.33	230,455	22,098	126,750	17,146	18,436	11,538	211,356	20,079	11,538	183,451	0.917	0	0	168,161
2029	3.33	238,130	22,834	130,971	17,717	19,050	11,827	218,395	20,747	11,827	189,560	0.897	0	0	169,998
2030	3.33	246,059	23,595	135,333	18,307	19,685	12,123	225,667	21,438	12,123	195,873	0.877	0	0	171,855
2031	3.33	254,253	24,380	139,839	18,916	20,340	12,426	233,182	22,152	12,426	202,395	0.858	0	0	173,733
2032	3.33	262,720	25,192	144,496	19,546	21,018	12,736	240,947	22,890	12,736	209,135	0.840	0	0	175,631
2033	3.33	271,468	26,031	149,308	20,197	21,717	13,055	248,970	23,652	13,055	216,099	0.822	0	0	177,550
2034	3.33	280,508	26,898	154,279	20,870	22,441	13,381	257,261	24,440	13,381	223,295	0.804	0	0	179,490
2035	3.33	42,882	4,112	23,585	3,190	3,431	2,659	39,328	3,736	2,438	34,356	0.801	764,191	210,227	581,492

1	16	17	18	19	20	21	22	23
<u>Year</u>	<u>Adjusted Loss</u>	<u>Interest</u>	<u>Total Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past								
2019	48,393	0	48,393	N/A	2.05	N/A	48,393	48,393
2020	112,099	184	112,282	N/A	0.38	N/A	112,282	160,675
2021	128,617	167	128,784	N/A	0.10	N/A	128,784	289,459
2022	188,940	8,190	197,129	N/A	2.79	N/A	197,129	486,588
2023	162,105	24,916	187,022	N/A	5.08	N/A	187,022	673,610
2024	160,922	33,366	194,287	N/A	5.08	N/A	194,287	867,897
2025	15,945	3,912	19,857	N/A	5.08	N/A	19,857	887,754
Future								
2025	146,261	0	146,261	0.90	3.41	0.97	141,894	1,029,648
2026	163,820	0	163,820	1.00	3.41	0.94	153,687	1,183,335
2027	165,393	0	165,393	1.00	3.41	0.91	150,046	1,333,381
2028	168,161	0	168,161	1.00	3.41	0.88	147,527	1,480,908
2029	169,998	0	169,998	1.00	3.41	0.85	144,221	1,625,129
2030	171,855	0	171,855	1.00	3.41	0.82	140,989	1,766,117
2031	173,733	0	173,733	1.00	3.41	0.79	137,829	1,903,946
2032	175,631	0	175,631	1.00	3.41	0.77	134,740	2,038,686
2033	177,550	0	177,550	1.00	3.41	0.74	131,721	2,170,407
2034	179,490	0	179,490	1.00	3.41	0.72	128,769	2,299,176
2035	581,492	0	581,492	0.15	3.41	0.71	415,107	2,714,283

Table 2: Economic Losses from Lost Earnings and Lost Employment Benefits for Mr. Snookal

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Year	Wage Growth Rate	Chevron Earnings and Performance Pay	Chevron Vacation Pay	Chevron Location Premium	Chevron Tax Equalization Benefit on Location Premium	Chevron ESIP Contribution	Chevron Employer Social Security Contribution	Actual Earnings, Performance Pay, and Bonuses	Actual Retirement Benefits (or ESIP Contributions)	Actual Employer Social Security Contribution	Loss	Tenure Prob.	Chevron Pension Benefits	Actual Chevron Pension Benefits	Adjusted Loss
Past															
2019	3.22	161,243	6,442	36,952	4,999	12,899	8,240	161,243	12,899	8,240	48,393	1.000	0	0	48,393
2020	3.82	176,795	16,953	97,237	13,154	14,144	8,537	155,629	12,450	8,537	150,203	1.000	0	0	150,203
2021	6.20	201,959	19,366	111,077	15,026	16,157	8,854	179,475	11,965	8,854	172,144	1.000	0	0	172,144
2022	5.47	213,011	20,426	117,156	15,848	17,041	9,114	143,145	5,726	8,875	234,849	1.000	0	0	234,849
2023	4.34	222,246	21,311	122,235	16,535	17,780	9,932	179,623	10,478	9,932	210,005	1.000	0	0	210,005
2024	3.33	229,646	22,021	126,305	17,086	18,372	10,453	185,400	17,613	10,453	210,417	1.000	0	0	210,417
2025	3.33	22,754	2,182	12,515	1,693	1,820	1,027	18,370	1,745	1,027	20,849	1.000	0	0	20,849
Future															
2025	3.33	214,539	20,572	117,997	15,962	17,163	9,687	173,204	16,454	9,687	196,575	0.973	0	0	191,247
2026	3.33	245,195	23,512	134,857	18,243	19,616	10,982	197,953	18,806	10,982	224,664	0.953	0	0	214,206
2027	3.33	253,360	24,295	139,348	18,850	20,269	11,257	204,545	19,432	11,257	232,145	0.932	0	0	216,263
2028	3.33	261,797	25,104	143,989	19,478	20,944	11,538	211,356	20,079	11,538	239,876	0.917	0	0	219,882
2029	3.33	270,515	25,940	148,783	20,126	21,641	11,827	218,395	20,747	11,827	247,864	0.897	0	0	222,285
2030	3.33	279,523	26,804	153,738	20,797	22,362	12,123	225,667	21,438	12,123	256,118	0.877	0	0	224,713
2031	3.33	288,831	27,696	158,857	21,489	23,107	12,426	233,182	22,152	12,426	264,646	0.858	0	0	227,168
2032	3.33	298,450	28,618	164,147	22,205	23,876	12,736	240,947	22,890	12,736	273,459	0.840	0	0	229,650
2033	3.33	308,388	29,571	169,613	22,944	24,671	13,055	248,970	23,652	13,055	282,565	0.822	0	0	232,159
2034	3.33	318,657	30,556	175,261	23,708	25,493	13,381	257,261	24,440	13,381	291,975	0.804	0	0	234,696
2035	3.33	48,714	4,671	26,793	3,624	3,897	3,020	39,328	3,736	2,438	45,217	0.801	868,121	210,227	694,124

1	16	17	18	19	20	21	22	23
<u>Year</u>	<u>Adjusted Loss</u>	<u>Interest</u>	<u>Total Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past								
2019	48,393	0	48,393	N/A	2.05	N/A	48,393	48,393
2020	150,203	184	150,387	N/A	0.38	N/A	150,387	198,779
2021	172,144	207	172,351	N/A	0.10	N/A	172,351	371,130
2022	234,849	10,502	245,351	N/A	2.79	N/A	245,351	616,482
2023	210,005	31,564	241,570	N/A	5.08	N/A	241,570	858,051
2024	210,417	42,510	252,927	N/A	5.08	N/A	252,927	1,110,978
2025	20,849	5,011	25,860	N/A	5.08	N/A	25,860	1,136,838
Future								
2025	191,247	0	191,247	0.90	3.41	0.97	185,536	1,322,374
2026	214,206	0	214,206	1.00	3.41	0.94	200,957	1,523,331
2027	216,263	0	216,263	1.00	3.41	0.91	196,196	1,719,527
2028	219,882	0	219,882	1.00	3.41	0.88	192,902	1,912,429
2029	222,285	0	222,285	1.00	3.41	0.85	188,579	2,101,008
2030	224,713	0	224,713	1.00	3.41	0.82	184,353	2,285,361
2031	227,168	0	227,168	1.00	3.41	0.79	180,221	2,465,582
2032	229,650	0	229,650	1.00	3.41	0.77	176,183	2,641,765
2033	232,159	0	232,159	1.00	3.41	0.74	172,234	2,813,999
2034	234,696	0	234,696	1.00	3.41	0.72	168,374	2,982,373
2035	694,124	0	694,124	0.15	3.41	0.71	495,511	3,477,885

Notes to the Tables

1. Year. The projected trial date is February 4, 2025.
2. Wage growth rate.
3. Chevron earnings and performance pay (without wrongdoing).
4. Chevron supplemental vacation pay (without wrongdoing).
5. Chevron location premium (without wrongdoing).
6. Chevron tax equalization benefit on location premium (without wrongdoing)
7. Chevron employer ESIP contributions (without wrongdoing).
8. Chevron employer Social Security contributions (without wrongdoing).
9. Actual Chevron and replacement earnings, performance pay, and bonuses.
10. Actual Chevron and replacement employer retirement contributions (or ESIP contributions).
11. Actual Chevron and replacement employer Social Security contributions.
12. Loss equals projected Chevron earnings and employment benefits absent termination minus actual and projected replacement earnings and employment benefits.
13. Tenure is the probability of continued employment with Chevron.
14. Chevron pension benefits (without wrongdoing).
15. Actual Chevron pension benefits.
16. Adjusted loss is loss adjusted for the probability of continued employment with Chevron plus the difference in Chevron pension benefits.
17. Pre-judgment interest.
18. Total loss is adjusted loss plus pre-judgment interest.
19. Discount period.
20. Discount rate.
21. Discount factor.
22. Present value of economic losses.
23. Cumulative present value of economic losses.

Exhibit A: Charles Baum's Resume

CHARLES L. BAUM II, Ph.D.

2930 Cherry Blossom Lane
Murfreesboro, Tennessee 37129
cbaum@baumeconomics.com
W: 615-556-9287

EMPLOYMENT

Middle Tennessee State University

Professor of Economics (2010-present)

Chair, Department of Economics and Finance (2008-2014)

Associate Professor of Economics (2004-2010)

Director of the Economics Graduate Programs (2004-2008)

Assistant Professor of Economics (1999-2004)

Baum Economics LLC

Member (2015-present)

EDUCATION

Ph.D., Economics, University of North Carolina at Chapel Hill (1999)

B.A., Economics, Wake Forest University (1995)

B.A., Political Science, Wake Forest University (1995)

RESEARCH INTERESTS / SPECIALTIES: Labor Economics, Employment, Wages, Earnings, Employment Benefits, Unemployment, Retirement Decisions, Worklife Expectancies, Social Security Income and Benefits, Business Valuations, Profits, Business Income, Antitrust Economics, Price-Fixing, and Predatory Pricing

TESTIMONY (DEPOSITION AND TRIAL)**

**Last five years (2018-2024), in reverse order; pre-2018 testimony available upon request.

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT IN AND
FOR SAINT LUCIE COUNTY, FLORIDA, JOSEPH ROM, and ERIN ROM, as

husband and wife, Plaintiff, v. AAA TRIPLE "S" SERVICES, INC., d/b/a STANLEY STEEMER, a for profit Corporation and JOHN DOE, an unknown employee, Defendants. Case No.: May 31, 2024. (Deposition).

IN COUNTY COURT AT LAW NUMBER THREE OF EL PASO COUNTY, TEXAS, MAURICIO CHONG, Plaintiff, v. SUNRISE RESTAURANTS, LLC, d/b/a DENNY'S, Defendant. CAUSE NO.: 2021-DCV-3302. May 29, 2024. (Deposition).

IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE, THOMAS P. WILSON, Ph.D., individually and as surviving spouse of the Deceased, PENNI JO WILSON, Plaintiff, v. CHATTANOOGA-HAMILTON COUNTY HOSPITAL AUTHORITY d/b/a ERLANGER HEALTHSYSTEM d/b/a ERLANGER NORTH HOSPITAL and LARRY D. STONE, M.D., Defendants. Case No.: 20-C-206. May 28, 2024. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE, NORTHERN DIVISION, KNOXVILLE UNITED STATES OF AMERICA ex. rel. PATRICK GRIFFIS, and PATRICK GRIFFIS, INDIVIDUALLY, Plaintiff, v. EOD TECHNOLOGY, INC. (n/k/a JANUS GLOBAL OPERATIONS LLC), Defendant. Civil Action No.: 3:10-cv-204. May 28, 2024. (Deposition).

IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS, KENNETH FIELDS, Plaintiff, v. SOUTHRN ELECTRIC & CONTROLS, LLC, and John Doe, Defendants. Case No. CT-004124-16, Div. III. May 21, 2024. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE, CARLTON SPEER, MALENA DENNIS, and ZACHARIAH DUNCAN, on their own behalf and on behalf of all others similarly situated, Plaintiffs, v. UCOR LLC, Defendant. Case No.: 3:22-CV-000426-TRM-JEM. May 21, 2024. (Deposition).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, ELVIS J. MINIS, Plaintiff, v. THOMAS BUTERA and KATHERINE DAVENPORT, Defendants. Case No.: 2019-cv-75781. May 9, 2024. (Trial).

IN THE STATE COURT OF MUSCOGEE COUNTY, STATE OF GEORGIA, TOSHA WOMBLE and TEDDY WOMBLE, Individually, and as Parents and Next Friends of GREYSEN WOMBLE, a disabled, minor, Plaintiffs, v. PIEDMONT HEALTHCARE, INC.; PIEDMONT COLUMBUS REGIONAL MIDTOWN; TIMOTHY PAUL VILLEGAS, M.D.; CHARLES BABERE, M.D.; and

JOHN/JANE DOE(S) 1-5; Defendants. CIVIL ACTION File No.: SC-2021-cv-001526. May 7, 2024. (Deposition).

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE,
WANDA CATHERINE ELDAHAN, Plaintiff, v. LINCOLN MEMORIAL
UNIVERSITY, Defendant. Case: 3:21-cv-00263-TAV-HBG. EEOC: 494-2022-02000. April 29, 2024. (Deposition).

IN THE CIRCUIT COURT OF WILLIAMSON COUNTY, TENNESSEE, PAULA RICHARDSON, as surviving spouse on behalf of her deceased husband, DAWSON RICHARDSON, JR., and individually, Plaintiff, v. KRISTINA BETHEL, D.O. and EMERGI-TRUST, P.C., Defendants. Case No.: 22-cv-189. April 26, 2024. (Deposition).

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, TENNESSEE AT CLARKSVILLE, VERNON M. CARRIGAN, as surviving kin of DAVID CARRIGAN, Plaintiff, v. AMERICAN FAMILY CARE TENNESSEE, LLC and, ANDREA BELL WILLIS, M.D., Defendants. No. CC-15-CV-1610. April 19, 2024. (Trial).

AMERICAN ARBITRATION ASSOCIATION, ALLIED FEDERAL BROTHERHOOD OF MAINTENANCE OF WAY EMPLOYEES, DIVISION OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS and JOHNATHON CANTY, Plaintiffs, v. CONNEX RAILROAD LLC and TRANSDEV NORTH AMERICA, INC., Defendants, Case No.: 6628127. April 12, 2024. (Arbitration).

IN THE FIRST CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, TWENTIETH JUDICIAL DISTRICT AT NASHVILLE, SHARON SHEILA RAMIREZ, et al., Plaintiffs, v. STOVER & SONS CONTRACTORS, INC., et al., Defendants. Civil Action No.: 20-c-2114. April 1, 2024. (Deposition).

COMMONWEALTH OF KENTUCKY, CALLOWAY CIRCUIT COURT, ROBERT DANIEL LEWIS and UNITED COMMUNITY BANK OF WEST KENTUCKY, Plaintiffs, v. CHRISTOPHER L. POOR, M.D., et al., Defendants, Civil Action No.: 21-CI-00065. March 28, 2024. (Deposition).

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE, DAVID SULLIVAN, DARLENE ROBERTSON, and CHARLES CUMMINS, Individually and on behalf of others similarly situated, Plaintiffs, v. METRO KNOXVILLE HMA, LLC, d/b/a TENNOVA HEALTHCARE, Defendant. Case No.: 3:22-CV-000392-DCLC-JEM. March 25, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT IN AND FOR HILLSBOROUGH COUNTY, FLORIDA, MANUEL SUARDI, Plaintiff, v. CHARLEY'S STEAKHOUSE INC., d/b/a CHARLEY'S STEAKHOUSE, Defendant. March 20, 2024. (Trial).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF INDIANA, INDIANAPOLIS DIVISION, BRANDON VAN BLAIR, Plaintiff, v. TERRY DRAKE, RUSH COUNTY SHERIFF'S OFFICE, ALLAN RICE, RUSH COUNTY, INDIANA, INDIANA STATE POLICE, and JOHN DOE, Defendants. Case No.: 1:22-cv-01215-RLU-MPB. March 15, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT IN AND FOR HILLSBOROUGH COUNTY, FLORIDA, MANUEL SUARDI, Plaintiff, v. CHARLEY'S STEAKHOUSE INC., d/b/a CHARLEY'S STEAKHOUSE, Defendant. January 26, 2024. (Deposition).

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT, PEORIA COUNTY, ILLINOIS, NICHOLAS MCDANIEL, Plaintiff, v. MATTHEW MARXEN and STANDARD FORWARDING, Defendants. Civil Action File No.: 21-L-00055. January 15, 2024. (Deposition).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE, STEVE and NATALIE DEFORD, Plaintiffs, v. MITCHELL STANLICK, D.C., LLC, d/b/a STANLICK CHIROPRACTIC, and JEREMY BILLS, D.C., Defendants. Case No.: 78000. December 11, 2023. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE, YOLONDA RIGGS, Plaintiff, v. UCOR LLC, Defendant. Case No.: 3-22-cv-00144. November 29, 2023. (Deposition).

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE, CARL R. HARRIS, Plaintiff, v. JTEKT AUTOMOTIVE TENNESSEE MORRISTOWN, INC., Defendant. Case No. 3:21-cv-332. November 20, 2023. (Deposition).

IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA, LAVENDER HEALTH CARE, LLC, a Florida limited liability company, Plaintiff, v. AFC FRANCHISING, LLC, an Alabama limited liability company, Defendant. November 16, 2023. (Trial).

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE, TWENTY-FIFTH JUDICIAL DISTRICT, HARDEMAN COUNTY, JOHN DOOLEN, in his Official

Capacity as Sheriff of Hardeman County, Tennessee, Plaintiff, v. ROY B. HERRON, NANCY C. MILLER-HERRON, HERRON LAW OFFICES, PETER J. ALLIMAN, III, and WHITE, CARSON & ALLIMAN ATTORNEYS AT LAW, P.C., Defendants. Case No.: 19502. November 14, 2023. (Mediation).

IN THE CHANCERY COURT FOR KNOX COUNTY, TENNESSEE, TERESA L. FERGUSON, Plaintiff, v. KNOX COUNTY, TENNESSEE, Defendant. No.: 197927-1. November 2, 2023. (Deposition).

BEFORE THE AMERICAN ARBITRATION ASSOCIATION, MURFREESBORO IMAGING PARTNERS LLC, directly and derivatively on behalf of MIDDLE TENNESSEE IMAGING, LLC, Claimant, v. SAINT THOMAS HEALTH f/k/a SAINT THOMAS HEALTH SERVICES and NOL, LLC, Respondents. Case No.: 01-22-0004-6371. October 24, 2023. (Mediation).

IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TWENTIETH JUDICIAL DISTRICT, NASHVILLE, TENNESSEE, MARK FRANCIS MACDUFF SPENCE, SR. and LAURIE JEAN SPENCE, Individually and as surviving parents of MARK FRANCIS MACDUFF SPENCE, JR. deceased, Plaintiffs, v. DEXCOM, INC., *et al.*, Defendants. Docket No.: 18-c-565. September 28, 2023. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, BRIAN MOAT, Plaintiff, v. THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TENNESSEE, Defendant. Case No. 3:21-cv-00807. September 13, 2023. (Trial).

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, TENNESSEE, ANTHONY BAKER, Plaintiff, BRIDGEFIELD CASUALTY INSURANCE COMPANY, INC., Plaintiff/Intervenor, v. NYRSTAR CLARKSVILLE, INC., and OUTOTEC (USA), INC., Defendants. Docket No.: CC-20-CV-768. July 31, 2023. (Deposition).

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE, ALEXIS TURNER and BREANA DYE, as Children and Next of Kin of Decedent CHARLES DYE, Plaintiffs, v. CHADWICK GARRISON and JARED GASTON, Defendants, Case No.: 20-c-1095; 19-c-2106. June 20, 2023. (Deposition).

IN THE CIRCUIT COURT OF KNOX COUNTY, TENNESSEE, CHARLES PATRICK MITCHELL, Plaintiff, v. NORFOLK SOUTHERN RAILWAY COMPANY, Defendant. Case No.: 3-134-21. June 8, 2023. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, ROBERT JUSTIN BING, Plaintiff, v. DARRELL LAMONT HUNT, M.D., ROGER JAMES NAGEY, M.D., DAVID ERIC BENTLEY, M.D., EMCARE, INC., KRISTIN ALEXANDRIA GAFFNEY, D.O., GASTROENTEROLOGY AND HEPATOLOGY ASSOCIATES PLLC, and HTI MEMORIAL HOSPITAL CORPORATION, d/b/a TRISTAR SKYLINE MEDCAL CENTER, Defendants, Case No. 17-c-1812. May 31, 2023. (Evidentiary Deposition Trial).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE, MARINA DEBITY, Plaintiff, v. MONROE COUNTY BOARD OF EDUCATION, Defendant. May 24, 2023. (Trial).

SUPERIOR COURT FOR THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES UNLIMITED JURISDICTION, RYAN CORNATEANU, individually, and on behalf of other members of the general public similarly situated, Plaintiff, v. STONELEDGE FURNITURE LLC, Defendant. May 12, 2023. (Deposition).

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, MELISSA KILPATRICK, Plaintiff, v. RUTHERFORD COUNTY, TENNESSEE, Defendant. CIVIL ACTION NO.: 19-CV-1732. May 8, 2023. (Deposition).

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA, BIRMINGHAM DIVISION, KENNETH AUSTIN, Plaintiff, v. UAB HOSPITAL MANAGEMENT, LLC; GEORGIA M. WHITT, R.N.; and Fictitious Party Defendants, Defendants. April 28, 2023. (Deposition).

IN THE IOWA DISTRICT COURT FOR MARION COUNTY, JOSHUA RICHARDSON, Plaintiff, v. VERMEER MANUFACTURING COMPANY, Defendant. April 26, 2023. (Trial).

STATE OF MINNESOTA, COUNTY OF HENNEPIN, IN DISTRICT COURT, FOURTH JUDICIAL DISTRICT, JEFFREY BJUR, Plaintiff, v. GOLD'N PLUMP POULTRY, INC., RICE COMPANIES, Defendants. April 11, 2023. (Evidentiary Deposition for Trial).

IN THE JUDICIAL COURT OF HARRIS COUNTY, TEXAS, 270TH DISTRICT COURT, MEMORIAL PARK MEDICAL CENTER, INC., and WILLIAM W. RUTH, Plaintiffs, v. STEWART TITLE GUARANTY COMPANY, THE BROWN COUNTY ABSTRACT COMPANY, INC., BERT V. MASSEY II, and E. RAY WEST III, Defendants. CAUSE NO. 2020-47658. April 7, 2023. (Deposition).

AMERICAN ARBITRATION ASSOCIATION, GEOFF JOHNSON, Claimant, v.
DILLARD'S, INC., Respondent. Case: 01-22-0001-2709. March 9, 2023.
(Arbitration).

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, BRAD AMOS, Plaintiff, v. THE LAMPO
GROUP, LLC, d/b/a RAMSEY SOLUTIONS; and DAVE RAMSEY, Defendant.
Case No: 3:21-cv-00923. January 18, 2023. (Deposition).

IN THE STATE COURT OF RICHMOND COUNTY, STATE OF GEORGIA,
KIARAH CALHOUN and BRYSON CALHOUN, Individually and as Parents and
Next Friends of BRAYDEN CALHOUN, a disabled minor, Plaintiffs, v. DOCTORS
HOSPITAL OF AUGUSTA, LLC a.k.a. DOCTORS HOSPITAL, AUGUSTA
WOMEN'S HEALTH & WELLNESS CENTER, DONNA ADAMS-PICKETT, MD,
BROOKLYN PARTRIDGE, RN, ANGELA BRAGG, RN, and JOHNS/JANE
DOE(S) 1-3, Defendants. Case No.: 2020-RCSC-00382. January 6, 2023.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE, CHRISTOPHER ANDERSON and JAMES "J.J." HATMAKER,
Plaintiffs, v. CITY OF JELlico, TENNESSEE, Defendant. Case No. 3:19-CV-096.
January 5, 2023. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA,
MIAMI DIVISION, MARK AROUZA-PAI, a citizen and resident of Canada,
Plaintiff, v. CARNIVAL CORPORATION, a Panamanian Corporation d/b/a
CARNIVAL CRUISE LINES, Defendant. Case No.: 1:21-CV-23511-KMW.
December 29, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, SOUTHERN DIVISION, FARIBA MOEINPOUR, Plaintiff, v.
BOARD OF TRUSTEES OF THE UNIVERSITY OF ALABAMA, KELLY
MAYER, in her individual capacity, and MARY JO CAGLE, in her individual
capacity, Defendants. December 27, 2022. (Deposition).

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE AT KNOXVILLE, TENNESSEE, SCOTT E. GAMMONS, Plaintiff,
v. ADROIT MEDICAL SYSTEMS, INC., GRAZYNA H. GAMMONS, KELLEY
PATTEN, and GENE GAMMONS, Defendants. December 19, 2022. (Deposition).

AMERICAN ARBITRATION ASSOCIATION, GEOFF JOHNSON, Claimant, v.
DILLARD'S, INC., Respondent. Case: 01-22-0001-2709. December 12, 2022.
(Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, NATALIE
NICHOLE MOODY and SHERENIA MOODY, individually and as next-of-kin to
the Deceased, EUGENE MOODY, Plaintiffs, v. CLARENCE EARL FOSTER III,
M.D., Defendant. December 7, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, JERRY LYNETTE CLARK as Personal Representative of the Estate of
JALEN MAYS, on behalf of the Estate and its lawful survivors, to wit: J.L.M.,
surviving son, L.M., as surviving son, K.S., surviving daughter, and C.M., surviving
daughter, Plaintiff, v. THE CITY OF JACKSONVILLE, FLORIDA, a political
subdivision of the State of Florida, THE JACKSONVILLE SHERIFF'S OFFICE, an
Agency of the Consolidated City of Jacksonville, MIKE WILLIAMS, in his official
capacity as Sheriff of the Jacksonville Sheriff's Office, OFFICER MATTHEW
REDDISH, OFFICER STUART MADDOX, and OFFICER KATHRYN
YOUNGBLOOD, Defendants. November 18, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, CAROL BARTON, Plaintiff, v. THE
METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE, Defendant. Case No. 3:20-CV-00118. November 9, 2022.
(Trial).

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE, EUGENIA
JARQUIN and ANTERO JARQUIN, Parents and Next of Kin of RIGOBERTO
JARQUIN, Deceased, Plaintiffs, v. RSD DELAWARE, LLC, a Delaware Limited
Liability Company; and LANDMARK PROPERTY MANAGEMENT, LLC, a
Delaware Limited Liability Company, Defendants. DOCKET NO. 20-C-597,
DIVISION I. November 4, 2022. (Deposition).

ARBITRATION PROCEEDINGS, COMMUNICATIONS PROCESSING SYSTEMS,
INC., a Florida corporation, Plaintiff, v. THE PALMS OF DESTIN RESORT and
CONFERENCE CENTER CONDOMINIUM ASSOCIATION, INC., a Florida
corporation, and THE PALMS OF DESTIN CLUB, LLC, a Florida limited liability
company, Defendants. October 21, 2022. (Arbitration).

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WISCONSIN, MADISON DIVISION, DEISY GABRIELA VAQUEDANO MEJIA,
INDIVIDUALLY AND ON BEHALF OF HER MINOR CHILDREN MAYLIN

SARAH ANDINO VAQUEDANO, AND ANDREA NICOLE ANDINO VAQUEDANO, Plaintiffs, v. THOMAS JOSEPH STEFFES, MICHELS CORPORATION, AND THE ABC INSURANCE COMPANY, Defendants. August 30, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS, PATRICIA EDWARDS, as Administrator of the Estate of WILLIE EDWARDS, deceased, Plaintiff, v. E.T. SIMONDS CONSTRUCTION COMPANY, an Illinois Corporation, Defendant. Court No.: 21-cv-00386. July 27, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA, ATLANTA DIVISION, SABINE AUGUSTE, and individually and on behalf of all others similarly situated, Plaintiff, v. ABP CORPORATION, Defendant. May 23, 2022. (Mediation).

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, TENNESSEE AT CLARKSVILLE, VERNON M. CARRIGAN, as surviving kin of DAVID CARRIGAN, Plaintiff, v. AMERICAN FAMILY CARE TENNESSEE, LLC and, ANDREA BELL WILLIS, M.D., Defendants. No. CC-15-CV-1610. April 22, 2022. (Deposition).

IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA, LAVENDER HEALTH CARE, LLC, a Florida limited liability company, Plaintiff, v. AFC FRANCHISING, LLC, an Alabama limited liability company, Defendant. April 20, 2022. (Deposition).

IN THE CIRCUIT COURT FOR KNOX COUNTY TENNESSEE, PRISCILLA GREENE MILLS, individually and as mother of JONATHAN DEAN MILLS, Deceased, Plaintiff, v. RURAL/METRO OF TENNESSEE, LP; RURAL/METRO CORPORATION OF TENNESSEE; RURAL/METRO MID-SOUTH, LP; AMERICAN MEDICAL RESPONSE OF TENNESSEE, INC.; MARK KEITH MORRISON; and DAWN OGLE, Defendants, No. 2-426-17. March 11, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE, CURTIS L. ROPER, Plaintiff, v. KNOXVILLE ASSISTED LIVING RETIREMENT COMMUNITY, LLC d/b/a MANORHOUSE AT KNOXVILLE, and MANORHOUSE MANAGEMENT, INC., Defendants. No.: 3:20-cv-00439. March 4, 2022. (Deposition).

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE,
NASHVILLE DIVISION, TERESA LARGE, etc., Plaintiff, v. DR. DAVID
BLAZER, Defendant, Civil Action No. 3:20-CV-1012. February 25, 2022.
(Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, MEMPHIS DIVISION, COURTNEY L. ALLEN, Plaintiff, v.
ADAMS KEEGAN, INC., Defendant. February 7, 2022. (Deposition).

IN THE UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF
TENNESSEE, PATRICK IRELAND and EMILY TOUCHSTONE, Plaintiffs, v.
WILLIAMSON COUNTY HOSPITAL DISTRICT d/b/a WILLIAMSON MEDICAL
CENTER, PAUL FLESER, M.D., and ANDREW HUNTER AVERY, M.D.,
Defendants. February 4, 2022. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA,
JOSEPH HENRY, Plaintiff, v. CELEBRITY CRUISES, INC., Defendant. CASE
NO. 21-cv-20148-DLG. February 2, 2022. (Trial).

IN THE CIRCUIT COURT FOR PUTNAM COUNTY, TENNESSEE, DYLAN
WELCH, Plaintiff, v. HIGHLANDS RESIDENTIAL SERVICES and MITCHELL L.
KNIGHT, Defendants. January 10, 2022. (Deposition).

IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT IN AND FOR
DUVAL COUNTY, FLORIDA, CIVIL DIVISION, WHITE'S PLACE, LLC d/b/a
THE GOLD CLUB, Plaintiff, v. EMERGENCY SYSTEMS, INC., Defendant.
December 29, 2021. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, EIGHTEENTH
JUDICIAL DISTRICT, SUMNER COUNTY, JAMES R. GILLESPIE, Plaintiff, v.
HENDERSONVILLE HOSPITAL CORPORATION d/b/a TRISTAR
HENDERSONVILLE MEDICAL CENTER, MARSHALL R. JOHNSON JR., M.D.,
HENDERSONVILLE HOSPITALIST SERVICES, INC., HELION W. CRUZ, M.D.,
CHRISTOPHER BACHUSS, DNP-DCC, AND SKYLINE NEUROSCIENCE
ASSOCIATES, LLC, Defendants. December 10, 2021. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE AT WINCHESTER, ASHLEY DAVIS/SARAH HARWELL, Plaintiff,
v. TULLAHOMA CITY SCHOOLS, Defendants. Case No.: 4:20-cv-00022.
December 3, 2021. (Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF TENNESSEE,
DANIEL A. PELTIER, Plaintiff, v. JOHN DEERE COMPANY, Defendant. Case
No.: 3:20-cv-00435-TRM-HBG. November 23, 2021. (Deposition).

IN CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE, NELLEE QUINN
NIX, a minor, by and through her parents and next of kin, JUSTIN NIX and
KRISTSA NIX, Plaintiffs, v. SAINT THOMAS MIDTOWN HOSPITAL,
TENNESSEE WOMEN'S CARE, P.C., ROSEANN MAIKIS, M.D., and
ELIZABETH BEAVERS, R.N., Defendants. November 1, 2021. (Trial).

IN THE IOWA DISTRICT COURT FOR POLK COUNTY, N. KIM GAMBLE and
DARRELL GAMBLE, Plaintiffs, v. TADD KENNEDY, GEORGIA MONAHAN
(DRIVER), RANDY MONAHAN (OWNER), and AUTO-OWNERS INSURANCE
COMPANY (UIM), Defendants. LAW NO. LACL144149. October 28, 2021.
(Trial).

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ALABAMA,
EASTERN DIVISION, TERRELL MCELRATH, Plaintiff, v. FCA US LLC and
DOE DEFENDANTS #1-5, Defendants. October 25, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, RANDY and KAREN O'BURKE,
Plaintiffs, v. HENDERSONVILLE HOSPITAL CORPORATION d/b/a TRISTAR
HENDERSONVILLE MEDICAL CENTER, MICHAEL JAMES NOTO, M.D.,
JAYESH A. PATEL, M.D., CLYDE O. SOUTHWELL, M.D., and MARSHALL R.
JOHNSON, JR., M.D., Defendants. No. 3:19-cv-01167. October 8, 2021.
(Deposition).

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF VIRGINIA,
ALEXANDRIA DIVISION, CHRISTOPHER CONNOR, Plaintiff, v. LOVEYBUG,
LLC, *et al.* and AMY GENOVA, Defendants. Case #1:20-cv-425. October 7, 2021.
(Deposition).

IN THE STATE COURT OF FULTON COUNTY, STATE OF GEORGIA, CHARLES
LIATYS, Plaintiff, v. SOUTHWIRE COMPANY, LLC, WESTBAY
TECHNOLOGIES, LTD., and HOME DEPOT U.S.A., INC., Defendants. Civil
Action File No.: 19-EV-00385. September 24, 2021. (Deposition).

IN CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE, NELLEE QUINN
NIX, a minor, by and through her parents and next of kin, JUSTIN NIX and
KRISTSA NIX, Plaintiffs, v. SAINT THOMAS MIDTOWN HOSPITAL,

TENNESSEE WOMEN'S CARE, P.C., ROSEANN MAIKIS, M.D., and ELIZABETH BEAVERS, R.N., Defendants. September 20, 2021. (Deposition).

IN THE CIRCUIT COURT FOR COFFEE COUNTY, TENNESSEE, SUSAN WALTON, individually and as surviving spouse and next of kin of JAMES WALTON, deceased, Plaintiff, v. TULLAHOMA HMA, LLC d/b/a HARTON REGIONAL MEDICAL CENTER, Defendant, No. 40937. September 14, 2021. (Trial).

SUPERIOR COURT OF NEW JERSEY, SOMERSET COUNTY, CHEE NG, Plaintiff, v. FAIRLEIGH DICKINSON UNIVERSITY, Defendant. LAW DIVISION DOCKET NO.: SOM-L-1216-19. August 31, 2021. (Deposition).

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT, PEORIA COUNTY, ILLINOIS, CALEB DERESTIL, Individually, and as Independent Administrator of the Estate of FASTINA DERESTIL, Deceased, Plaintiffs, v. OSF HEALTHCARE SYSTEM d/b/a OSF-SAINT FRANCIS MEDICAL CENTER; MATTHEW E. SMETANA, D.O., Individually and as an Agent of OSF HEALTHCARE SYSTEM d/b/a OSF-SAINT FRANCIS MEDICAL CENTER; TODD R. MITCHELL, M.D., Individually and as an Agent of OSF HEALTHCARE SYSTEM d/b/a OSF-SAINT FRANCIS MEDICAL CENTER, Defendants. Case No.: 16-L-183. August 26, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, COLUMBIA DIVISION, JEFFERY LOWE, Plaintiff, v. CALSONICKKANSEI NORTH AMERICA, INC., Defendant. Case No. 1:18-CV-00027. August 25, 2021. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT, DANILO PURUGGANAN, Plaintiff, v. AFC FRANCHISING, LLC, Defendant. CIVIL ACTION NO. 3:20-cv-00360. July 28, 2021. (Deposition).

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE, JAMES W. HUBBARD, Plaintiff, v. CVG NATIONAL SEATING COMPANY, LLC, d/b/a COMMERCIAL VEHICLE GROUP, Defendant. No.: 3:20-cv-00229-PLR-DCP. July 13, 2021. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK, JEANNETTE DICK, Plaintiff, v. UNITED STATES OF AMERICAN and UNITED STATES POSTAL SERVICE, Defendants. Case No.: 19-CV-8952 (PGG). July 7, 2021. (Deposition).

IN THE SUPERIOR COURT OF BARTOW COUNTY, STATE OF GEORGIA, MELISSA JOHNSON as surviving spouse of CAMERON JOHNSON, Deceased, Plaintiff, v. THOMAS SELF, M.D., HARBIN CLINIC, LLC, HANS CHANG, M.D., and SUMMIT RADIOLOGY SERVICES, P.C., Defendants, Civil Action File No. SUCV2020000684. June 15, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI, OXFORD DIVISION, KURT RADEMACHER, as Executor of the Estates of Michael McConnell Perry and Kimberly Westerfield Perry; and ROBERT ANDREW PERRY, as Next Friend and Guardian of S.M.P., J.W.P., and A.R.P., the Minor Natural Children and Wrongful Death Beneficiaries of Michael McConnell Perry and Kimberly Westerfield Perry, Plaintiffs, v. UNITED STATES OF AMERICA; UNITED STATES DEPARTMENT OF TRANSPORTATION; FEDERAL AVIATION ADMINISTRATION; JOHN DOES 1-5, Defendants. CIVIL ACTION NO.: 3:19-cv-157-MPM-RP. June 8, 2021. (Deposition).

IN THE DISTRICT COURT, 219TH JUDICIAL DISTRICT, COLLIN COUNTY, TEXAS, SANTOS CORTEZ & AZALIA CORTEZ, Plaintiffs, v. POLLOCK INVESTMENTS INCORPORATED and FTW TRANSPORT, LLC, AND GERIN CARRIERS, LLC, Defendants. CAUSE NO.: 219-04337-2016. April 20, 2021. (Trial).

IN THE SUPERIOR COURT OF WHITFIELD COUNTY, GEORGIA, CAROLYN REUSSWIG, Plaintiff, v. GILFORD JOHN WHITTLE, VELMA WHITTLE, RED'S CARPET AND APPLIANCES, LLC, ROBERT BODENBENDER, FEDEX CORPORATION, and FEDEX GROUND PACKAGE SYSTEM, INCORPORATED, Defendants. April 19, 2021. (Deposition).

IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE FOR THE 20TH JUDICIAL DISTRICT AT NASHVILLE, JOSEPH WESSON and TONYA WILLIAMS, INDIVIDUALLY and as NOK of their infant Son KAI MAXIM WESSON, deceased, Plaintiffs, v. HCA HEALTH SERVICES OF TENNESSEE, INC., d/b/a TRISTART STONECREST MEDICAL CENTER, PEDIATRIX MEDICAL GROUP OF TENNESSEE, P.C., and ELIZABETH M. BROGDON, NNP, Defendants. Case No. 17c2379. April 2, 2021. (Deposition).

FIRST JUDICIAL DISTRICT COURT, PARISH OF CADDO, STATE OF LOUISIANA, ELWYN CHISHOLM v. CITY OF SHREVEPORT, NUMBER 615,158. March 31, 2021. (Trial).

IN THE STATE COURT OF MUSCOGEE COUNTY, STATE OF GEORGIA, ROBERT WISOR, Individually, and as Husband of JODI WISOR; and JODI

WISOR, Individually, and as Wife of ROBERT WISOR, Plaintiffs, v.
PYROTECNICO FIREWORKS, INC.; JAMES W. WOODWORTH; and PATRICIA
DAWN WOODWORTH, Defendant. Civil Action File No.: SC-19-CV-689. March
12, 2021. (Deposition).

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA, DEAN N.
WILLIAMS, an Individual, Plaintiff, v. KAISER FOUNDATION HOSPITALS, a
California corporation; KAISER FOUNDATION HEALTH PLAN, INC., a
California corporation; Dr. Hon Lee, an Individual; and DOES 1 through 50
inclusive, Defendants. Case No. HG 19003608. February 15, 2021. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, LISA ROACH, Plaintiff, v.
MONTGOMERY COUNTY GOVERNMENT, Defendant. January 8, 2021.
(Deposition).

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA,
CHANCELLOR LEONARDO WILLIAMS, a Minor, by and through his Parents and
Next Friends, BREDIA NEWBOLT-WILLIAMS and ANTHONY WILLIAMS,
Plaintiffs, vs. THE CHILDREN'S HOSPITAL OF ALABAMA; et al., Defendants.
Case No. 03-cv-2018-901209. December 28, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE, COMPREHENSIVE SECURITY, INC.,
ASSOCIATED PROTECTIVE SERVICE, INC., and ONTRAC SECURITY, LLC,
Plaintiffs, v. METROPOLITAN GOVERNMENT OF NASHVILLE AND
DAVIDSON COUNTY, Defendant. November 13, 2020. (Trial).

26TH JUDICIAL DISTRICT COURT, BOSSIER PARISH, LOUISIANA, SUSAN
RUSH, ET AL. v. RICHARD DOYLE, ET AL. NUMBER 145,041, SECTION F.
November 1, 2020. (Deposition).

IN THE 2ND CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE,
BRETTON KEEFER, as surviving adult Son and next-of-kin of his deceased Mother,
CHESTA SHOEMAKER, Plaintiffs, v. VANDERBILT UNIVERSITY MEDICAL
CENTER, Defendant. NO. 19C358. October 29, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE, THEODORE PERTILLER, Plaintiff, v. CITY OF
MURFREESBORO, TN, Defendant. October 13, 2020. (Deposition).

IN THE STATE COURT OF FULTON COUNTY, STATE OF GEORGIA, SALLY A. QUISENBERRY, Individually and as Administratrix of the Estate of MICHAEL J. QUISENBERRY, Deceased, Plaintiff, v. VIKRAM KHETPAL, M.D., and HEART AND VASCULAR CARE, INC., Defendants, Civil Action No. 19-ev-001559. October 6, 2020. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE, FELICIA LUCKETT, individually, as next of kin for AL STAR, deceased, Plaintiff, v. NASHVILLE READY MIX, INC., and EVANS BRIDGES, Defendants. NO. 19-C-2010. September 10, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION, AMY PHILLIPS, Plaintiff, v. EXXONMOBIL CORPORATION, Defendant. Case No. 17-cv-7703. September 3, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA, NORTHEASTERN DIVISION, BRANDI HANDLEY, as the Personal Representative of the Estate of Edward Wayne Handley, BRANDI HANDLEY, as the Mother and Next Friend of Jaxsyn Lewis Handley, a minor child, Plaintiffs, v. UNITED STATES OF AMERICA, Defendant. Case No.: 5:17-CV-01278-HNJ. August 28, 2020. (Trial).

UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF WISCONSIN, JASEN BRUZEK, HOPE KOPLIN, NEIL MILLER, and CHRISTOPHER PETERSON, individually and on behalf of all others similarly situated, Plaintiffs, v. HUSKY OIL OPERATIONS, LTD., and SUPERIOR REFINING COMPANY LLC, Defendants. Case No. 18-cv-697. August 14, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA, JENNIFER YOUNG, as the Administratrix and personal representative of the estate of JERMAINE McBEAN, Plaintiff, v. PETER PERAZA, BRAD OSTROFF, RICHARD LACERRA, GREGORY TONY, in his official capacity as Sheriff of Broward County, FL, Defendants, CASE NO. 15-60968-CIV-COHN/SELTZER. June 8, 2020. (Deposition).

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA, DISHANNA GARMON, as Personal Representative of the Estate of ALEXANDER ARMSTRONG, deceased, on behalf of the Estate and its lawful survivor, to wit: A.A., as surviving daughter, Plaintiff, v. SP LINCOLN FIELDS, LP, a Florida Limited Partnership, KCD INVESTMENTS, INC., a Florida

Corporation, and MASTER SECURITY COMPANY, LLC, d/b/a MSC SECURITY, LLC, a Foreign Limited Liability Company, Defendants. GENERAL JURISDICTION DIVISION, CASE NO.: 2015-22639 CA 01. March 6, 2020. (Deposition).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, SECTION A, JAMIE CLUTE, ZACHARY CLUTE AND GARRETT CLUTE, Plaintiffs, v. CURTIS L. BRACY, SHREVEPORT TRANSIT MANAGEMENT, INC. d/b/a SPORTRAN, AND AMERICAN ALTERNATIVE INSURANCE CORPORATION, Defendants. NUMBER: 607.956. March 2, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, MERRILL BEENE, Plaintiff, v. MATTHEW WHITAKER, ACTING UNITED STATES ATTORNEY GENERAL, Defendant. Case No. 3:18-cv-00693. February 6, 2020. (Deposition).

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ALABAMA, NORTHWESTERN DIVISION, JAMES LESTER MATTHEWS, II, Plaintiff, v. UNITED STATES OF AMERICA, Defendant, Case No.: 3:18-cv-01280-HNJ. January 15, 2020. (Deposition).

IN THE CIRCUIT COURT OF SULLIVAN COUNTY, TENNESSEE AT KINGSPORT, TRACY MICHAEL, Plaintiff, v. WELL MONT WEXFORD HOUSE f/k/a RHA/SULLIVAN, INC. and WELL MONT HEALTH SYSTEM, d/b/a THE WEXFORD HOUSE, Defendants. No.: C40837(M). December 20, 2019. (Deposition).

IN THE SUPERIOR COURT OF ROCKDALE COUNTY, STATE OF GEORGIA, SAWYER A. STOKES, a Minor, by and through STEPHANIE M. STOKES and LINDEN D. STOKES, Conservators of the Property, and STEPHANIE M. STOKES and LINDEN D. STOKES, individually, Plaintiffs, vs. ROCKDALE HOSPITAL, LLC d/b/a ROCKDALE MEDICAL CENTER, GREYSTONE OB/GYN, LLC, RICHARD M. ROBINSON, and ALECIA T. CASH, Defendants. Civil Action. File Number: 2018-CV-2166. November 26, 2019. (Deposition).

STATE OF MINNESOTA, DISTRICT COURT, COUNTY OF DAKOTA, FIRST JUDICIAL DISTRICT, ROBIN NELSON, Plaintiff, v. SCOTT JOHNSON and JOHNSON DIVERSIFIED PRODUCTS, INC., Defendants. November 1, 2019. (Trial).

IN ARBITRATION, KATHERIN CASEY v. CONCORDE CAREER COLLEGE,
AMERICAN ARBITRATION ASSOCIATION CASE NUMBER: 01-18-0002-8695.
October 30, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, DOUGLAS BUTTS, Plaintiff, v. T-
MOBILE USA, INC., Defendant. October 24, 2019. (Deposition).

IN ARBITRATION, KATHERIN CASEY v. CONCORDE CAREER COLLEGE,
AMERICAN ARBITRATION ASSOCIATION CASE NUMBER: 01-18-0002-8695.
October 17, 2019. (Deposition).

IN THE CIRCUIT COURT FOR WILLIAMSON COUNTY, TENNESSEE, MARTY
FITZGERALD and MELISSA FITZGERALD, individually, as husband and wife,
and on behalf of their deceased child, MEGAN FITZGERALD, Plaintiff, v. JAMES
WOODROW OSBORN and OSBORN ENTERPRISES, INC., II, and OSBORN
ENTERPRISES, INC., III, Defendant, NO. 2018-311. August 9, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE FOR THE
MIDDLE DISTRICT NASHVILLE DIVISION, DR. VANESSA GARCIA, Plaintiff,
v. THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE, Defendant. June 18, 2019. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, STEAD
VESTHEY, as next of kin of and on behalf of KOREN VESTHEY, Deceased, Plaintiff,
v. THOMAS BRENLIN TAYLOR, JR., M.D., SKYLINE SURGERY
ASSOCIATES, PLC, TRISTAR SKYLINE MEDICAL CENTER, ASSUMED
NAME FOR THE HTI MEMORIAL HOSPITAL CORPORATION, KRISTIN
ALEXANDRIA GAFFNEY, D.O., AND GASTROENTEROLOGY AND
HEPATOLOGY ASSOCIATES, PLLC, Defendants, Case No. 17C963. May 20,
2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION, MISTY D. MCGRADY, Plaintiff, v. JIM
MATTIS, Secretary of Defense, in his official capacity; ROBERT M. SPEER, Acting
Secretary of the Army, in his official capacity; JOSEPH L. LENGYEL, Chief,
National Guard Bureau, in his official capacity; VICTORIA A. LIPNIC, Acting
Chair, EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, in her official
capacity; TERRY M HASTON, Adjutant General of the State of Tennessee, in his
official capacity, and the UNITED STATES OF AMERICA, Defendants. NO. 3:17-
cv-00390. April 23, 2019. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-FIRST JUDICIAL DISTRICT, WILLIAMSON COUNTY, SUMMERS PAUL LYLE III and PATRICIA LYLE, Plaintiffs, v. WILLIAM R. MCDANIEL, M.D., Defendant. Case No.: 2017-62. April 2, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION, JOHN EDWARD ANDERSON III, Plaintiff, v. OAK RIDGE SCHOOLS BOARD OF EDUCATION a/k/a OAK RIDGE CITY BOARD OF EDUCATION and OAK RIDGE SCHOOLS, DR. BRUCE BORCHERS, officially and individually, and DR. CHRIS MARCZAK, officially and individually, Defendants. Case No. 3:16-cv-235. March 13, 2019. (Trial).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA, FORT LAUDERDALE DIVISION, KAREN EVICH and ROBERT EVICH, both individuals, Plaintiff, v. TARGET CORPORATION, a foreign corporation, Defendant. Case No.: 0-18-cv-61062. February 14, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION, BENJAMIN MILLER and KRISTI ROSE, Plaintiffs, v. TIGER STYLE CORPORATION d/b/a SPEED 1 TRANSPORT, HARMAN DEEP SINGH BRAR & COX TRANSPORTATION SERVICES, INC., Defendants. Docket No. 2:18-cv-02275-SHL. February 1, 2019. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-THIRD JUDICIAL DISTRICT, DICKSON COUNTY, ROBIN LYNN JACKSON, Plaintiff, v. DICKSON EAR, NOSE & THROAT, PLC d/b/a ENT SINUS & ALLERGY CLINIC, and JAMES M. ROTH, M.D., Defendants. No. 22cc-2017-cv-89. January 4, 2019. (Deposition).

UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, EPAC TECHNOLOGIES, INC., Plaintiff, v. THOMAS NELSON INC., Defendant. Case No: 3-13-cv-384-WMC. September 14, 2018. (Deposition).

DISTRICT COURT, JEFFERSON COUNTY, COLORADO, JANET TORMA-KRAJEWSKI, Plaintiff, v. COLORADO SCHOOL OF MINES; RAMONA M. GRAVES; PRISCILLA NELSON; JURGEN BRUNE; and TERRY PARKER, Defendants. Case Number: 2016-CV-31341. August 14, 2018. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, JAMES GARRETT, Plaintiff, v. CSX

TRANSPORTATION, INC., Defendant. Case No.: 3:17-cv-497. August 3, 2018. (Deposition).

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, GEORGE L. ECKLES, JR., Petitioner, v. MARY ANN ECKLES, Respondent. July 19, 2018. (Trial).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, MARK MCLAUGHLIN, Plaintiff, v. JODY HOLLIS AND STATE FARM MUTUAL AUTOMOBILE INURANCE COMPANY, Defendants, PERMANENT ASSIGNMENT SECTION C, NUMBER: 581,417. June 28, 2018. (Trial).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-FIRST JUDICIAL DISTRICT, WILLIAMSON COUNTY, SUMMERS PAUL LYLE III and PATRICIA LYLE, Plaintiffs, v. WILLIAM R. MCDANIEL, M.D., Defendant. Case No.: 2017-62. June 21, 2018. (Deposition).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, MARK MCLAUGHLIN, Plaintiff, v. JODY HOLLIS AND STATE FARM MUTUAL AUTOMOBILE INURANCE COMPANY, Defendants, PERMANENT ASSIGNMENT SECTION C, NUMBER: 581,417. May 30, 2018. (Deposition).

IN THE SULLIVAN COUNTY LAW COURT AT KINGSOFT, TENNESSEE, CHRIS YOKLEY and DIANA YOKLEY, HUSBAND and WIFE, Plaintiffs, v. MOUNTAIN EMPIRE OIL COMPANY, Defendant, CASE NUMBER: C40558. May 9, 2018. (Deposition).

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE, TRACY PIZZILLO VON TAGEN, Plaintiff, v. CONTINENTAL PROPERTIES COMPANY, INC., SPRINGS AT MOUNTAIN VIEW, CIVIL CONSTRUCTORS, INC., MCSHANE CONSTRUCTION COMPANY, TERRACON, CIVIL SITE DESIGN GROUP, and QORE PROPERTY SCIENCES, Defendants. DOCKET NO. 11C-2589. March 27, 2018. (Deposition).

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Research Citations

My research has recently been cited in the news by *Bloomberg BusinessWeek*, *U.S. News and World Report*, and the *New York Times*.

A recent publication of mine on paid family leave legislation was reviewed and cited in the 2022 and 2023 Economic Reports of the U.S. President by the Council of Economic Advisers.

The Washington Center for Equitable Growth presented results from my research on female employment rates and trends before the U.S. House Select Committee on Economic Disparity and Fairness in Growth on December 8, 2021.

The U.S. Department of Labor used results from my research on state legislation providing paid parental leave from work at the 2015 White House Summit on Working Families.

ASSOCIATIONS

American Association of Economic and Financial Experts (AAEFE)

National Association of Forensic Economics (NAFE)

PRESENTATIONS (RECENT, SELECTED)

Economics and Workforce Development Trends: U.S. and Tennessee Workforce Trends, Data, and Resources, University of Tennessee-Knoxville, Institute for Public Service, Center for Industrial Services, Murfreesboro, TN, August 2022.

Tennessee Legislative Update and Economic Outlook, Tennessee Association of Professional Bail Agents, Murfreesboro, TN, August 2022.

Tennessee and U.S. Economic Outlook, Murfreesboro Young Professionals, Professional Development Luncheon, Murfreesboro, TN, June 2022.

The U.S. and State Economic Forecast, Oakworth Wealth Management/Oakworth Capital Bank, Nashville, TN (Bluebird Café), October 2021.

The Economic Outlook for Tennessee and the U.S., Murfreesboro Breakfast Rotary, Murfreesboro, TN, August 2021.

The Economic Outlook for Tennessee and the U.S., Tennessee Society of Certified Public Accountants, Brentwood, TN, August 2021.

Tennessee Economics and Legislative Update, Murfreesboro Breakfast Rotary, Murfreesboro, TN, January 2021.

Tennessee Economics and Legislative Update, Smyrna Rotary, Smyrna, TN, July 2020.

Tennessee Economics and Legislative Update, Rutherford County GOP Women, Murfreesboro, TN, July 2020.

Seven Careers in a Lifetime? An Analysis of Employee Tenure. American Economic Association, Allied Social Science Association Annual Meetings, San Diego, CA, January 2020.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Tennessee. Law Conference for Tennessee Practitioners, Nashville School of Law, Nashville, TN, November 2019.

The State and U.S. Economic Forecast. The Exchange Club, Murfreesboro, TN, August 2019.

How to Calculate Economic Damages in Medical Malpractice Wrongful Death and Personal Injury Cases in Tennessee. The 2019 Medical Malpractice Conference for Tennessee Attorneys, Nashville, TN, May 2019.

How to Calculate Economic Damages in Medical Malpractice Wrongful Death and Personal Injury Cases in Alabama. The 2019 Medical Malpractice Conference for Alabama Attorneys, Birmingham, AL, May 2019.

The U.S. Economic Forecast. Tennessee Realtors Association, 2019 Excel Summit, Franklin, TN, March 2019.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Tennessee. Law Conference for Tennessee Practitioners, Nashville School of Law, Nashville, TN, November 2018.

Economics 101: Where are We and Where are We Going? Mid-South Commercial Law Institute, Nashville, TN, October 2017.

Calculating Hedonic Damages in Arkansas. National Association of Forensic Economics, Winter Meetings, Cancun, Mexico, January 2017.

The Economic Impacts of Wrongful Incarceration. National Association of Forensic Economics, Winter Meetings, Cancun, Mexico, January 2017.

The Accuracy of Social Security Wage Projections. National Association of Forensic Economics, Winter Meetings, Key West, FL, January 2016.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Alabama. Huntsville Bar Association, Huntsville, AL, May 2016.

Employee Tenure and Economic Losses. National Association of Forensic Economics, Winter Meetings, San Juan, Puerto Rico, January 2015.

COMMUNITY ACTIVITIES

Tennessee State House of Representatives (Representative, 2018-present; Vice Chairman of the House Finance, Ways, and Means Committee, 2021-present).

Oaklands Historic Mansion Foundation (Board Member, 2015-2022).

Community Foundation of Rutherford County (Founding Board Member, 2018-2021).

Linebaugh Library Foundation (Board Member, 2014-2020).

Murfreesboro City Schools Foundation (Board Member, 2013-2019).

Rutherford County Commission (Commissioner, 2010-2018).

American Heart Association, Rutherford County (Board Member, 2012-2017).

United Way of Rutherford and Cannon Counties (Board Member, 2013-2017).

Domestic Violence Center, Murfreesboro (Board Member, 2005-2010; Advisory Board Member, 2010-2015).

Eagle Scout (September 12, 1988, Great Smokey Mountain Council, Knoxville, TN).

Exhibit B: Case-Related Documents

1. Complaint for damages and jury trial demand.
2. Income tax returns for Mr. and Mrs. Snookal for 2021, 2022, and 2023.
3. W-2 forms from Chevron USA, Inc., for Mr. Snookal for 2019 and 2020.
4. Chevron compensation statement for Mr. Snookal for 2018 (January 1, 2019).
5. Chevron coverage details for Mr. Snookal (May 8, 2015).
6. Chevron retirement plan (January 1, 2014).
7. Chevron basic life insurance plan (January 1, 2014).
8. Chevron supplemental life insurance plan (January 1, 2014).
9. Chevron Employee Savings Investment Plan (January 1, 2014).
10. Chevron tax equalization policy (December 31, 2015).
11. Chevron assignment offer letter for Mr. Snookal (July 1, 2019).
12. Chevron remuneration sheet for Nigeria job for Mr. Snookal (July 9, 2019).
13. Chevron tax agreement and limited power of attorney agreement (August 2, 2019).
14. Chevron rotational expatriate assignments.
15. Chevron location premiums by area of assignment.
16. Job offer letter from Nippon Dynawave Packing Co. for Mr. Snookal (August 3, 2021).
17. Nippon Dynawave Packaging Co. Benefits Guide.
18. Georgia-Pacific Benefits Guide for 2023.
19. Phone call with Mr. Snookal (June 6, 2024).
20. Phone call with Ms. Leal and Ms. Flechsig (June 25, 2024).

Exhibit C: Treatises and Other Information

1. 26 U.S.C. § 6621.
2. 28 U.S.C. § 1961.
3. *Albemarle Paper Co. v. Moody*, 422 U.S. 405, 95 S.Ct. 2362, 45 L.Ed.2d 280 (1975).
4. Baum, Charles L. (2021). “Calculating Economic Damages in Ninth Circuit Employment Cases.” *Arizona Attorney*, 57 (5): 54-58.
5. Baum, Charles L. (2013). “Employee Tenure and Economic Losses in Wrongful Termination Cases.” *Journal of Forensic Economics*, 24 (1): 41-66.
6. Becker, Gary. (1975). *Human Capital*. New York, NY: National Bureau of Economic Research.
7. Ben-Porath, Yoram. (1967). “The Production of Human Capital and the Life Cycle of Earnings.” *Journal of Political Economy*, 75 (4): 352-365.
8. *Blankenship v. Liberty Life Assur. Co. of Boston*, 486 F.3d 620, 628 (9th Cir.2007).
9. Board of Governors of the Federal Reserve System. (2024). “Economic and Research Data.” <https://www.federalreserve.gov/econresdata/default.htm> (Selected Interest Rates – H.15).
10. Brookshire, Michael L., and Stan V. Smith. (1990). *Economic/Hedonic Damages: The Practice Book for Plaintiff and Defense Attorneys*. Chicago, IL: Smith Economics Group, LTD.
11. Bureau of Labor Statistics. (2024a). “Current Employment Survey, Employment, Hours, and Earnings of Production and Nonsupervisory Employees.” Linares, D.C., U.S. Bureau of Labor Statistics: <http://data.bls.gov/pdq/SurveyOutputServlet> (Databases, Tables, and Calculators by Subject).
12. Bureau of Labor Statistics. (2024b). “Employment Cost Index, historical Listing – Volume 5.” Linares, D.C., U.S. Bureau of Labor Statistics: <https://www.bls.gov/web/eci/ecicois.pdf> (Table 8).
13. Bureau of Labor Statistics. (2024c). “Consumer Price Index – CPI Databases.” Linares, D.C., U.S. Bureau of Labor Statistics: <https://www.bls.gov/cpi/data.htm> (All Urban Consumers).
14. Bureau of Labor Statistics. (2024d). “Employer Costs for Employee Compensation – December 2023.” *Monthly Labor Review*, March 13, 2024: <http://www.bls.gov/news.release/pdf/ecec.pdf>.
15. *Cassino v. Reichhold Chemicals, Inc.*, 817 F.2d 1338 (9th Cir.1987).
16. Congressional Budget Office. (2024). “An Update to the Budget and Economic Outlook:

- 2024-2034.” (February 2024 Update).
17. *Domingo v. New England Fish Co.*, 727 F.2d 1429 (9th Cir.1984).
 18. *E.E.O.C. v. Farmer Bros. Co.*, 31 F.3d 891 (9th Cir.1994).
 19. *Ford Motor Co. v. E.E.O.C.*, 458 U.S. 219, 102 S.Ct. 3057, 73 L.Ed.2d 721 (1982).
 20. *Galindo v. Stoody*, 793 F.2d 1502 (9th Cir.1986).
 21. Gilbert, Roy F. (1997). “Long-Term and Short-Term Changes in Earnings Profiles.” *Journal of Forensic Economics*, 10 (1): 29-49.
 22. *Gauthier v. Eastern Oregon Correctional Institution*, 2006 WL 2728957 (D.Ore.2006).
 23. *Jones & Laughlin Steel Corp. v. Pfeifer*, 462 U.S. 523 (1983).
 24. *Kelly v. Am. Standard, Inc.*, 640 F.2d 974 (9th Cir.1981).
 25. Martin, Gerald D. (2010). *Determining Economic Damages*. Costa Mesa, CA: James Publishing Corporation.
 26. Skoog, Gary R., James E. Ciecka, and Kurt V. Krueger. (2019). “The Markov Model Labor Force Activity 2012-2017: Extended Tables of Central Tendency, Shape, Percentile Points, and Bootstrap Standard Errors.” *Journal of Forensic Economics*, 28 (1): 15-108.
 27. Social Security Administration. (2024a). “Social Security: Contribution and Benefit Base.” <https://www.ssa.gov/OACT/COLA/cbb.html>.
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 29. Social Security Trustees Report. (2024). “2024 OASDI Trustees Report.” Washington, D.C.: Social Security Administration, 2024 OASDI Trustees Report, Economic Assumptions and Methods, Tables V.B1 and V.B2.
 30. *Thorne v. City of El Segundo*, 802 F.2d 1131 (9th Cir.1986).
 31. United States Department of Health and Human Services. (2023). “National Vital Statistics Reports, United States Life Tables, 2021.” U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, National Vital Statistics System, United States Life Tables.
 32. *W. Pac. Fisheries, Inv. v. SS President Grant*, 730 F.2d 1280 (9th Cir.1984).